

Annual 47 C.F.R. § 64.2009(e) CPNI CertificationEB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2009**

Date filed: **Jan 21, 2010**

Name of company covered by this certification: **INPHONEX.COM LLC**

Form 499 Filer ID: **824926**

Name of signatory: **Kooi Lim**

Title of signatory: **CEO, Managing Member**

I, **Kooi Lim**, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

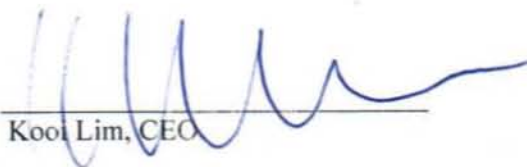
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (see attached affidavit, Appendix A).

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed

Kooi Lim, CEO

A handwritten signature in blue ink, appearing to read 'Kooi Lim', is written over a horizontal line.

Statement and Affidavit Confirming Annual CPNI Compliance

+ Identification of CPNI and Service Affected by CPNI Rules.

The company has established procedures and trained employees having access to customer data on CPNI consistent with the definition of CPNI set forth in the FCC's rules.

+ Uses of CPNI without customer approval

The company has established procedures and trained employees having access to, having occasion to use CPNI, to identify, consistent with FCC Rules, when it is allowable to use CPNI without requiring client authorization.

+ Uses of CPNI requiring customer authentication

The company has established procedures and trained employees having access to, or having occasion to use CPNI, in how to identify and properly use CPNI requiring client authorization, consistent with the FCC's CPNI rules.

+ Employee training and discipline

The company has established procedures and trained employees having access to customer data on CPNI consistent with the definition of CPNI and the Commission's strengthened safeguards to protect against unauthorized disclosure. The company has an express disciplinary process in place in the event CPNI policies and procedures are not followed. In this regard, as access to CPNI is considered confidential and proprietary to Inphonex, it falls within the disciplinary policy of the company information security policy. As such, if any employee conduct access to CPNI that is not in compliance with FCC rules, the company action could be, for an employee, denial of access to CPNI up to termination of employment.

+ Record of Customer CPNI Approval/Non-Approval

At such time when the company wishes to initiate use of CPNI for marketing to its clients with corresponding launch of a notification and Opt-In/Out process, the company will develop and utilize a system of maintaining and use. Only management is allowed any marketing efforts when it comes to areas that concerns CPNI.

+ Procedures protecting against disclosure of CPNI

Since the company's inception, as an interconnected VoIP provider, the company has implemented procedures that comply with all FCC CPNI rules. These procedures have been reviewed and updated in accordance with the changes implemented with the EPIC CPNI Order. The Companies procedures include, but are not limited to the following:

+ We authenticate clients account credentials – password and account id. For backup, email address on record and/or address on record, before disclosing CPNI on client initiated telephone contacts or business office visits.

+ If, on a customer initiated call, the customer does not provide the correct password, call detail can only be provided by sending it to the customer's address of record, or by calling the customer at the telephone number of record.

+ We have instituted a policy where our customer representatives are NOT allowed to prompt the customer for the correct password by asking for readily available biographical information, or account information.

+ Clients are provided online access to each client's own account information using client controlled password. If client loses password, client can, by his/her own, reset password. The client password reset requires a valid email on record in order for the reset to work

+ There is a procedure to notify clients of account changes, by email, to email address on record.


÷ Actions taken against data brokers and responses to customer complaints.

There have been no actions taken against data-brokers and there have been no customer complaints regarding this type of issue.

÷ Procedures for notifying law enforcement of CPNI security breaches.

The company has adopted procedures to notify law enforcement of CPNI security breaches, and ensures that all data are kept for at least 2 years. We have taken steps to ensure that all employees are familiar with this requirement.

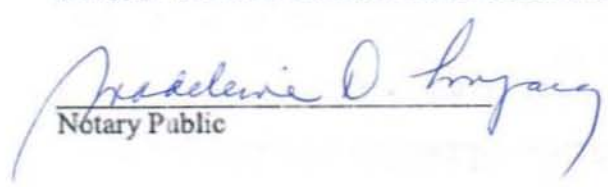
I hereby attest that the foregoing is true and correct to the best of my knowledge.


Kooi Lim, CEO
INPHONEX.COM LLC

2/16/10
Date

BEFORE ME, the undersigned authority, personally appeared Mr. Kooi Lim, who is personally known by me or who has produced Florida Drivers License as identification and did execute the foregoing.

SWORN TO AND SUBSCRIBED before me this 16th day of February, 2010.


Notary Public

Typed, Printed, or Stamped Name
My Commission Expires: _____



MADELEINE D. LONGARAY
MY COMMISSION # DD 819167
EXPIRES: November 8, 2012
Bonded Thru Budget Notary Services